

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

JOLEEN K. YOUNGERS, as Personal  
Representative of the Wrongful Death  
Estate of Roxsana Hernandez,

Plaintiff,

vs.

LASALLE CORRECTIONS TRANSPORT LLC,  
LASALLE CORRECTIONS WEST LLC,  
LASALLE MANAGEMENT COMPANY LLC,  
GLOBAL PRECISION SYSTEMS LLC,  
TRANSCOR AMERICA LLC,  
CORECIVIC, INC., and  
UNITED STATES OF AMERICA,

Defendants.

NO. 20-cv-00465-WJ-JHR

**DEFENDANTS TRANSCOR AND CORECIVIC'S RESPONSE TO PLAINTIFF'S  
MOTION TO EXCEED EXHIBIT PAGE LIMITS FOR MOTIONS TO COMPEL  
DISCOVERY (Dkt. 170)**

Defendants TransCor America, LLC and CoreCivic, Inc. respond as follows to Plaintiff's Motion to Exceed Page Limits (Dkt. 170).

Defendants continue to believe that Plaintiff's Motions to Compel are premature because the parties have not reached an impasse, except as to one issue involving training/personnel materials for CoreCivic employees, and that Plaintiff did not satisfy the good-faith conferral requirement in Rule 37(a)(1), Fed. R. Civ. P., or the Court's discovery dispute procedures as articulated during the Initial Rule 16 Scheduling Conference prior to filing her Motions. While Plaintiff belatedly requested an informal discovery conference with the Court after filing her Motions, because the Court indicated that it would not consider the merits of any discovery issues during the conference,

Defendants believe that there is no alternative but to respond to Plaintiff's Motions as filed. Accordingly, Defendant do not oppose Plaintiff's request to exceed the page limits for her exhibits to both Motions. Defendants will continue to attempt to resolve this issue with Plaintiff's counsel in order to avoid having the Court have to spend time on this matter.

Dated: November 10, 2022

/s/ Anne M. Orcutt

Daniel P. Struck, AZ Bar No. 012377

Jacob B. Lee, NM Bar No. 154613

Anne M. Orcutt, AZ Bar No. 029387

STRUCK LOVE BOJANOWSKI & ACEDO, PLC

3100 West Ray Road, Suite 300

Chandler, AZ 85226

Tel.: (480) 420-1600

Fax: (480) 420-1696

[dstruck@strucklove.com](mailto:dstruck@strucklove.com)

[jlee@strucklove.com](mailto:jlee@strucklove.com)

[aorcutt@strucklove.com](mailto:aorcutt@strucklove.com)

Deborah D. Wells

Debra J. Moulton

KENNEDY, MOULTON & WELLS, P.C.

2201 San Pedro NE, Bldg. 3, Suite 200

Albuquerque, New Mexico 87110

Tel.: (505) 884-7887

Fax: (505) 884-7123

[ddwells@kmwpc.com](mailto:ddwells@kmwpc.com)

[dmoulton@kmwpc.com](mailto:dmoulton@kmwpc.com)

*Attorneys for Defendants TransCor America, LLC  
and CoreCivic Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 10, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Irene R. Lax	<a href="mailto:ilax@gelaw.com">ilax@gelaw.com</a>
Cynthia B. Morgan	<a href="mailto:cmorgan@gelaw.com">cmorgan@gelaw.com</a>
Dale Melchert	<a href="mailto:dale@transgenderlawcenter.org">dale@transgenderlawcenter.org</a>
Lynly Egyes	<a href="mailto:lynly@transgenderlawcenter.org">lynly@transgenderlawcenter.org</a>
Daniel Yohalem	<a href="mailto:daniel.yohalem@gmail.com">daniel.yohalem@gmail.com</a>
Katherine Murray	<a href="mailto:kemurraylaw@gmail.com">kemurraylaw@gmail.com</a>
<i>Attorneys for Plaintiff</i>	

Gregory D. Steinman	<a href="mailto:gds@madisonlaw.com">gds@madisonlaw.com</a>
Celina Hoffman	<a href="mailto:cbacahoffman@parklawnm.com">cbacahoffman@parklawnm.com</a>
<i>Attorneys for Defendant Global Precision Systems LLC</i>	

Adam D. Rafkin	<a href="mailto:rr@rafkinlaw.com">rr@rafkinlaw.com</a>
<i>Attorney for LaSalle Defendants</i>	

Elizabeth M. Martinez,	<a href="mailto:elizabeth.martinez@usdoj.gov">elizabeth.martinez@usdoj.gov</a>
<i>Attorney for Defendant United States of America</i>	

Robert F. Gentile	<a href="mailto:rgentile@guebertlaw.com">rgentile@guebertlaw.com</a>
Clinton E. Dow	<a href="mailto:cdow@guebertlaw.com">cdow@guebertlaw.com</a>
<i>Attorneys for Third-Party Defendant Asset Protection and Security Services, L.P.</i>	

/s/ Allen Rowley

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